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6 Attorneys for Plaintiff Rodan & Fields, LLC

7 UNITED STATES DISTRICT COURT  
 8 NORTHERN DISTRICT OF CALIFORNIA  
 9

10 RODAN & FIELDS, LLC, a California limited  
 11 liability company,

12 Plaintiff,

13 v.

14 SHAZAD GILANI; et al.,

15 Defendants.

CASE NO. 16-cv-07242-JSC

**[PROPOSED] STIPULATED FINAL  
 JUDGMENT AND PERMANENT IN-  
 JUNCTION**

16 Plaintiff, Rodan & Fields, LLC ("R+F"), and defendants Shaikh Kashif Ali ("Ali"),  
 17 Shazad Gilani ("Gilani"), Darlin Gelilang ("Gelilang"), and Top Brands International, Inc. ("Top  
 18 Brands") (collectively, "Named Defendants"), reached a compromise and an agreement to settle  
 19 this action through the Confidential Settlement and Release Agreement, dated September 6, 2017  
 20 (the "Agreement"). It is stipulated, agreed and acknowledged by R+F and Named Defendants  
 21 that neither the Agreement nor this Stipulated Final Judgment and Permanent Injunction is an  
 22 admission of liability by any party for any matter under the terms of the Agreement, and that the  
 23 parties have consented to the form and substance of the following order.

24 IT IS HEREBY ORDERED, ADJUDGED, AND DECREED, pursuant to the stipulation  
 25 and consent of the parties, that all claims against Named Defendants are hereby dismissed with  
 26 prejudice, subject to:  
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**[PROPOSED] STIPULATED FINAL JUDGMENT  
 AND PERMANENT INJUNCTION  
 CASE NO. 16-cv-07242-JSC**

**Defendants Ali and Top Brands, including anyone acting on their behalf or at their direction, are hereby permanently restrained and enjoined from:**

- ## II. MONITORING COMPLIANCE

(1) Take all reasonable steps sufficient to monitor and ensure that all persons within Ali's or Top Brands' control or employment (whether independent contractors, employees, agents, partners, or otherwise) comply with this Order, including by not limited to, providing a copy of this Order to any person within their control or employment and requiring that such persons adhere to its terms; and

(2) Taking all reasonable corrective action with respect to any individual within their control or employment whom defendants Ali and Top Brands determine is not in compliance with the terms of this Order, which may include training, disciplining, and/or terminating such individual, and notifying R+F in writing of the underlying conduct.

### **III. PERSONS BOUND**

It is further ORDERED that, pursuant to Rule 65(d)(2) of the Federal Rules of Civil Procedure, this Order is binding upon the following persons who receive actual notice of it: the parties, the parties' officers, agents, servants, employees, and attorneys, and other persons who are in active concert or participation with the parties or the parties' officers, agents, servants, employees, and attorneys.

### **IV. RETENTION OF JURISDICTION**

It is further ORDERED that this Court shall retain jurisdiction of this matter in law and in equity for the purposes of enforcing and/or adjudicating claims in violation of this Order or of disputes arising out of, or in connection with, the Confidential Settlement and Release Agreement entered into the parties hereto. Any such matters shall be raised by noticed motion.

Each party shall bear its own costs, expenses and attorneys' fees. All claims against Defendants John Does 1-100 are hereby dismissed without prejudice.

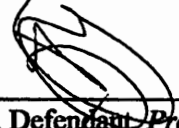
**IT IS SO ORDERED.**

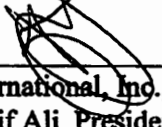
**SIGNED and ENTERED** this \_\_\_\_ day of \_\_\_\_\_ 2017.

\_\_\_\_\_  
UNITED STATES MAGISTRATE JUDGE

[PROPOSED] STIPULATED FINAL JUDGMENT  
AND PERMANENT INJUNCTION  
CASE NO. 16-cv-07242-JSC

1 SEEN AND AGREED:

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3 \_\_\_\_\_  
4 Shaikh Kashif Ali, Defendant, *Pro Se*

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6 \_\_\_\_\_  
7 Top Brands International, Inc., Defendant  
8 By Shaikh Kashif Ali, President

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10 Shazad Gilani, Defendant, *Pro Se*

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12 Darlin Gelilang, Defendant, *Pro Se*

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26 Attorneys for Plaintiff Rodan & Fields, LLC  
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4 Shaikh Kashif Ali, Defendant, *Pro Se*

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By Shaikh Kashif Ali, President

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